

1 Luke Busby, Esq.  
2 Nevada State Bar #10319  
3 316 California Avenue  
4 Reno, Nevada 89509  
(775) 453-0112  
[luke@lukeandrewbusbyltd.com](mailto:luke@lukeandrewbusbyltd.com)

5 Lauren Gorman, Esq.  
6 Nevada State Bar #11580  
7 275 Hill Street, Suite 248  
8 Reno, Nevada 89501  
(775) 742-6129  
[lgorman@laurengormanlaw.com](mailto:lgorman@laurengormanlaw.com)

9 *Attorneys for the Plaintiffs*

10 **UNITED STATES DISTRICT COURT**

11  
12 **DISTRICT OF NEVADA**

13 ERICA BLUTH, an individual, and  
14 LAVORIA WILSON, an individual,

15 Plaintiff,

16 v.

17 TYLER BAEHR, and individual, and THE  
18 CITY OF RENO, a political subdivision of  
19 the State of Nevada.,

20 Defendants.

Case No.: 3:25-cv-00129 MMD-CSD

21  
22 **STIPULATED PROTECTIVE ORDER**

23 Based on the findings and Orders of the Court at the May 28, 2025 Case  
24 Management Conference, the parties hereby submit the following proposed Protective  
25 Order.

26 In order to protect the confidentiality of confidential information obtained by the  
27 parties in connection with this case, the Court Orders the following:  
28

1 Any party or non-party may designate as "confidential" (by stamping the  
2 relevant page or otherwise as set forth herein) any document or response to discovery  
3 which that party or non-party considers in good faith to contain confidential  
4 information, subject to protection under the Federal Rules of Civil Procedure, or state or  
5 federal law ("Confidential Information"). Where a document or response consists of  
6 more than one page, the first page and each page on which confidential information  
7 appears shall be so designated. This protective order shall also constitute an  
8 authorizing order of a court of competent jurisdiction under 5 U.S.C. § 552a(b)(11) (part  
9 of the Privacy Act).

10

11 A party or non-party may designate information disclosed during a deposition or  
12 in response to written discovery as "confidential" by so indicating in said response or a  
13 party or non-party may designate in writing, within twenty (20) days after receipt of said  
14 responses or of the deposition transcript for which the designation is proposed, that  
15 specific pages of the transcript and/or specific responses be treated as "confidential"  
16 information. Any other party may object to such proposal, in writing or on the record.  
17 Upon such objection, the parties shall follow the procedures described in paragraph 8  
18 below. After any designation made according to the procedure set forth in this  
19 paragraph, the designated documents or information shall be treated according to the  
20 designation until the matter is resolved according to the procedures described in  
21 paragraph 8 below, and counsel for all parties shall be responsible for marking all  
22 previously unmarked copies of the designated material in their possession or control  
23 with the specific designation.

24

25 All information produced or exchanged in the course of this case (other than  
26 information that is publicly available) shall be used by the party or parties to whom the  
27 information is produced solely for the purpose of this case.

1 Except with the prior written consent of other parties and the non-party  
2 providing the Confidential Information, if applicable, or upon the prior order of this  
3 Court obtained upon notice to opposing counsel, Confidential Information shall not be  
4 disclosed to any person other than:

5 (a) counsel for the respective parties to this litigation, including in-house counsel  
6 and co-counsel retained for this litigation;

7 (b) employees of such counsel;

8 (c) individual parties, any officer or employee of a party, to the extent deemed  
9 necessary by Counsel for the prosecution or defense of this litigation;

10 (d) consultants or expert witnesses retained for the prosecution or defense of  
11 this litigation, provided that each such person shall execute a copy of the  
12 Certification annexed to this Order as Exhibit "A" (which shall be retained by  
13 counsel to the party so disclosing the Confidential Information and made  
14 available for inspection by opposing counsel during the pendency or after the  
15 termination of the action only upon good cause shown and upon order of the  
16 Court) before being shown or given any Confidential Information;

17 (e) any authors or recipients of the Confidential Information;

18 (f) the Court, Court personnel, and court reporters; and

19 (g) witnesses (other than persons described in paragraph 4(e)). A witness shall  
20 sign the Certification before being shown a confidential document. Confidential  
21 Information may be disclosed to a witness who will not sign the Certification  
22 only in a deposition at which the party who designated the Confidential  
23 Information is represented or has been given notice that Confidential Information  
24 shall be designated "Confidential" pursuant to paragraph 2 above. Witnesses  
25 shown Confidential Information shall not be allowed to retain copies.

26

27

28

1 Any persons receiving Confidential Information shall not reveal or discuss such  
2 information to or with any person who is not entitled to receive such information,  
3 except as set forth herein.

4 Unless otherwise permitted by statute, rule, or prior court order, papers filed  
5 with the Court under seal shall be accompanied by a contemporaneous motion for  
6 leave to file those documents under seal, and shall be filed consistent with the court's  
7 electronic filing procedures in accordance with Local Rule IA 10-5. Notwithstanding  
8 any agreement among the parties, the party seeking to file a paper under seal bears  
9 the burden of overcoming the presumption in favor of public access to papers filed in  
10 court. *Kamakana v. City and County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006); *Pintos*  
11 v. *Pac. Creditors Ass'n*, 605 F.3d 665, 677-78 (9th Cir. 2010); *Center for Auto Safety v.*  
12 *Chrysler Group, LLC*, 809 F.3d 1092, 1097 (9th Cir. 2016).

14 A party may designate as "Confidential" documents or discovery materials  
15 produced by a non-party by providing written notice to all parties of the relevant  
16 document numbers or other identification within thirty (30) days after receiving such  
17 documents or discovery materials. Any party or non-party may voluntarily disclose to  
18 others without restriction any information designated by that party or non-party as  
19 confidential, although a document may lose its confidential status if it is made public.  
20

21 If a party contends that any material is not entitled to confidential treatment,  
22 such party may at any time give written notice to the party or non-party who  
23 designated the material. The party or non-party who designated the material shall have  
24 twenty-five (25) days from the receipt of such written notice to apply to the Court for an  
25 order designating the material as confidential. The party or non-party seeking the order  
26 has the burden of establishing that the document is entitled to protection.  
27

28 Notwithstanding any challenge to the designation of material as Confidential

1 Information, all documents shall be treated as such and shall be subject to the  
2 provisions hereof unless and until one of the following occurs:

3 (a) the party or non-party who claims that the material is Confidential Information  
4 withdraws such designation in writing; or  
5 (b) the party or non-party who claims that the material is Confidential Information  
6 fails to apply to the Court for an order designating the material confidential  
7 within the time period specified above after receipt of a written challenge to  
8 such designation; or  
9 (c) the Court rules the material is not confidential.

10 All provisions of this Order restricting the communication or use of Confidential  
11 Information shall continue to be binding after the conclusion of this action, unless  
12 otherwise agreed or ordered. Upon conclusion of the litigation, a party in the  
13 possession of Confidential Information, other than that which is contained in pleadings,  
14 correspondence, and deposition transcripts, shall either (a) return such documents no  
15 later than thirty (30) days after conclusion of this action to counsel for the party or  
16 non-party who provided such information, or (b) destroy such documents within the  
17 time period upon consent of the party who provided the information and certify in  
18 writing within thirty (30) days that the documents have been destroyed.

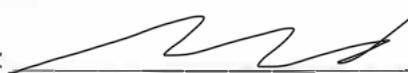
19 The terms of this Order do not preclude, limit, restrict, or otherwise apply to the  
20 use of documents at trial.

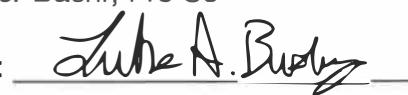
21 Nothing herein shall be deemed to waive any applicable privilege or work  
22 product protection, or to affect the ability of a party to seek relief for an inadvertent  
23 disclosure of material protected by privilege or work product protection.

24 Any witness or other person, firm, or entity from which discovery is sought may  
25 be informed of and may obtain the protection of this Order by written advice to the  
26

1 parties' respective counsel or by oral advice at the time of any deposition or similar  
2 proceeding.

3 Dated: May 31, 2025

4 BY:   
5 Tyler Baehr, Pro Se

6 BY:   
7 Luke A. Busby, Esq.  
8 Nevada State Bar #10319  
9 316 California Avenue  
10 Reno, Nevada 89509  
11 (775) 453-0112  
12 luke@lukeandrewbusbyltd.com

13 Lauren Gorman, Esq.  
14 Nevada State Bar #11580  
15 275 Hill Street, Suite 248  
16 Reno, Nevada 89501  
17 (775) 742-6129  
18 lgorman@laurengormanlaw.com  
19 Attorneys for the Plaintiffs

20 BY:   
21 Peter Keegan, Esq.  
22 Deputy City Attorney  
23 Nevada State Bar No. 12237  
24 Reno City Attorney  
25 P.O. Box 1900  
26 Reno, NV 89505  
27 Attorney for Defendant City of Reno

28 IT IS SO ORDERED:  
29   
30

31 UNITED STATES MAGISTRATE JUDGE

32 DATED: June 2, 2025

**EXHIBIT "A"****CERTIFICATION**

I hereby certify my understanding that Confidential Information is being provided to me pursuant to the terms and restrictions of the Protective Order dated \_\_\_\_\_, 2025, in Bluth et al v Baehr et al., Civil No. 3:25-cv-00129-ART-CSD. I have been given a copy of that Order and read it. I agree to be bound by the Order. I will not reveal the Confidential Information to anyone, except as allowed by the Order. I will maintain all such Confidential Information – including copies, notes, or other transcriptions made therefrom – in a secure manner to prevent unauthorized access to it. No later than thirty (30) days after the conclusion of this action, I will return the Confidential Information – including copies, notes, or other transcriptions made therefrom – to the counsel who provided me with the Confidential Information. I hereby consent to the jurisdiction of the United States District Court for the purpose of enforcing the Protective Order.

By: \_\_\_\_\_ DATED: \_\_\_\_\_